



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 2, 2020

BY ECF

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Mircea Constantinescu, et al.*, 19 Cr. 651 (LTS)

Dear Judge Swain:

The Government respectfully submits this letter to request, with the consent of the defendants, that, in light of the advice given by the Centers for Disease Control and Prevention and other public health authorities to take precautions to reduce the possibility of exposure to COVID-19, the Court adjourn the status conference presently scheduled for April 28, 2020, at 10:00 a.m., to a date and time convenient to the Court on or after June 1, 2020.

The Government also respectfully requests, with the consent of the defendants, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from April 28, 2020, until the date of the rescheduled status conference, in light of the circumstances of the COVID-19 pandemic, and in order to permit the defendants to complete their review of the discovery materials produced in this case and to provide the parties additional time to discuss potential pretrial dispositions.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: *Robert B. Sobelman*
Elizabeth A. Hanft
Daniel M. Loss
Samuel P. Rothschild
Robert B. Sobelman
Assistant United States Attorneys
(212) 637-2334/6527/2504/2616

cc: All Counsel of Record (by ECF)